



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 31, 2009

Honorable Bud Norris
Mayor of Mount Vernon
P.O. Box 809
Mount Vernon, WA 98273-0809

Dear Mayor Norris:

I appreciated the opportunity to meet with the City on July 28, 2009 to discuss Mount Vernon's participation in the National Flood Insurance Program (NFIP). The meeting, called a Community Assistance Visit (CAV), was with Jana Hanson and Rick Prosser of your Planning and Community Development Department staff. This letter summarizes findings and discussions from the meeting.

A primary purpose of our visit was to assure enforcement by the City of Chapter 15.36, Floodplain Management Standards, of the Mount Vernon Municipal Code. Continued enforcement enables FEMA to continue to allow flood insurance to be sold in the City. Other purposes of these visits are to provide you with the most current information on the NFIP and State regulations and to give your staff an opportunity to discuss issues concerning the City's floodplain management program.

Our meeting was very productive. Those in attendance have key responsibilities for the City in the permitting of floodplain development, and it was clear that they had a very good understanding of the NFIP and how floodplain cases need to be handled. Our major concerns at CAV meetings involve: [1] the currency of local floodplain regulations; [2] procedures for implementing these regulations, and [3] information to document findings from our Field Inspection Report. Our findings related to these concerns follow:

Floodplain Regulations. Chapter 15.36 was reviewed prior to the meeting. We found the Chapter to be fully compliant with NFIP and State floodplain management regulations.

Procedures. At our last CAV in 2003 we noted that the City had excellent procedures, particularly through use of the Flood Area Development Permit and through issuance by the City of Elevation Certificates (EC) with Section B data provided by the City, and the requirement that the completed EC be returned to the City before getting a Certificate of Occupancy. At this CAV meeting, we confirmed that this and related procedures have not changed, thus letting us to conclude that the City's procedures are very adequate to implement Chapter 15.36.

As a reminder, below-grade crawl space construction is considered by FEMA to be non-compliant with NFIP regulations. While we did not find any such cases in our field work, the



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issue will come up in future CAVs. Also, we suggest for any improvements to structures in the City's flood hazard areas that the City note in permit files the cost components of the determination of whether or not the improvement was a substantial improvement.

Field Inspection Report Cases. There were 12 specific cases cited in our Field Inspection Report for which documentation was requested. Excellent documentation was provided by Mr. Prosser on all 12 of these cases.

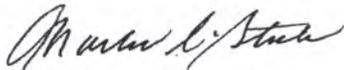
Using numbers from our Field Inspection Report, it was found that Cases #2, 8 and 12 pre-dated the date of our 2003 CAV so no additional data was required. Cases #1 and 7 were shown to be improvements that were less than substantial improvements. Elevation Certificates or other elevation information were provided by Mr. Prosser to show that Cases #3, 4, 5, 6, 9, 10 and 11 had been built in compliance with Chapter 15.36. In Case #10, both an EC and a Floodproofing Certificate were provided. In the case of new construction of the WalMart building and the new building at 1306 Roosevelt, we were provided with elevation information from site plans.

In summary, there were no unresolved findings from our July 28, 2009 CAV. This closes the CAV for Mount Vernon. Our conclusion is that the City is effectively regulating development in the City's flood hazard areas. By copy of this letter, we are notifying FEMA of this certification.

I appreciate the excellent cooperation of your staff throughout this process. I would especially like to commend the work of Rick Prosser. He has become an expert in the floodplain management work that is important in terms of implementing the State and Federal regulations. He is very conscientious, is in contact with either FEMA or Ecology when there is any question about a difficult case and has created innovative systems to track and manage floodplain cases. The City is well served by a person of this caliber.

If any questions should arise in administering Chapter 15.36, please feel free to call me at (425) 649-7139.

Sincerely,



Charles L. Steele
Floodplain Management Specialist

cc: Mark Carey, FEMA
Dan Sokol, Ecology
Jana Hanson
Rick Prosser